APPENDIX E

Reporting Burden Reduction Opportunities for States

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Grants, Planning, and Other Cross-Cutting

Original Reporting Requirement	State Recommendation	Change Adopted in FY07 or in FY08
Quality Management Plan (QMP)	Review every 5 years instead of every 2.	Flexibility exists for NPMs/regions unless significant performance problems warrant more frequent reviews.
Grants records retention	Standardize 3-year period (some states have 5-year periods).	General rule: 10-year retention period for Superfund, 3 years for all other programs.
Toxic Substances Control Act (TSCA) grant applications	Consolidate TSCA grant ($39,000) with other larger grants.	TSCA section 404 (g) grants provided to states on a formula basis or otherwise exempt from the Agency's competition policy can be included in PPGs and also consolidated with other program grants under 40 CFR 35.109.
Improve system for reviewing state comments on NPM guidance, regional work commitments and measures	Identify what is new from previous year; respond to state comments; transparency for all documents.	Implemented.
Minority Business Enterprise/Women Business Enterprise (MBE/WBE) Reporting	Eliminate; report annually not quarterly.	New rule reduces reporting frequency from quarterly to semi-annually.
Quarterly grant reports	Eliminate for smaller grants such as UIC, pesticides, PCBs, Pb, asbestos; for EPA water grants, reduce reporting to annual or less often and eliminate reporting, with the exception of a final report, on grants of $100k or less.	Frequency of progress reports is a program office decision. 40 CFR 31.40 states that progress reports should be not more than quarterly and not less than annually. OGD will provide to NPMs, for their consideration, states' recommendation that progress reports be required not more frequently than semi-annually, unless there is a documented need for more frequent reporting.
Reporting for PPA/PPG and categorical grants	Reporting for all grants should be annual; grants for less than $100k should only be reported when grant completed; delete quarterly report for CWA 105 and accept annual report.	Frequency of progress reports is a program office decision. 40 CFR 31.40 states that progress reports should be not more than quarterly and not less than annually. OGD will provide to NPMs, for their consideration, states' recommendation that progress reports be required not more frequently than semi-annually, unless there is a documented need for

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		more frequent reporting.
Reporting for PPA/PPG and categorical grants	PPA end-of-year annual report should only document results for PPA workplans; UT requests more flexibility to manage Small Business Compliance Assistance Program in same manner as large quantity hazardous waste generator.	State and R8 to address both issues during discussions to restructure PPA in FY08. UT is interested in transitioning to a multi-year PPA which would cover the same period as existing multi-year PPG.
Reporting for PPA/PPG and categorical grants	South Dakota: for originally prepared multi-year PPAs, EPA requires annual updates which are so extensive that many streamlining benefits have been lost.	R8 pledged to South Dakota that it will control unnecessary requests each year from various R8 programs and urge NPMs to minimize annual updates.
Reporting for PPA/PPG and categorical grants	Eliminate progress reports for individual grants included in the PPA/PPG and shift from quarterly to annual reporting.	R3 to require a semi-annual "exceptions-only" report and an annual progress report for PPGs beginning in FY08.
Quarterly financial status reports (FSR)	Reduce frequency as not all federal agencies require them.	FSRs will be required not more frequently than annually. Memo to be sent from Las Vegas Financial Management Center (LVFMC) informing all regions in FY08.
Grant application requirements	Require less detailed explanations for travel, supplies, etc. and accept estimates of state's best judgment at the time of grant application.	New cost review guidance for grants streamlines process (effective January 2008).
Federal cash transaction report (FCTR)	Eliminate annual submission as data is available in EPA's Automated Standard Application for Payments (ASAP) database.	Report will be required only at the end of the project funding period. LVFMC will issue a memo informing regions of this.
Certification regarding lobbying, pre-award compliance review and assurances in grant applications	Allow annual blanket assurances and batch and file once/year.	OGD to develop a proposal in FY08 for bundling application assurances and certifications and will work with states to make greater use of E-Apply which will ease the application process. Effective immediately.

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Office of Water (OW)

Original Reporting Requirement	State Recommendation	Change Adopted (FY07/08)
Safe Drinking Water Information System (SDWIS)	Modify SDWIS-fed to extract data from SDWIS-state for: public water compliance report; Significant Noncompliance (SNC) list annotation; strategic performance measures.	Available now.
SDWIS	Monthly deliverables of inventory data, chemical data, reports, letters, etc. to EPA in hard copy is burdensome and time-consuming. Track all information electronically via SDWIS-state instead.	R6 agrees and reporting will no longer be required (effective FY07).
SDWIS	EPA should generate capacity development reporting for new systems with SNCs instead of states.	EPA will generate report when requested by a state.
SDWIS	Must correct and send back to EPA public water system quarterly noncompliance reports: EPA should fix the database.	EPA completed modernization of SDWIS-fed in 2006 which should have addressed issue.
National Pollutant Elimination Discharge System (NPDES) permit backlog, Electronic Permit Issuing Forecasting Tool (e-PIFT)	E-PIFT duplicates information currently in PCS database.	If a state provides information in either PCS or ICIS, no reporting in the Permits Management Oversight System (replacement for e-PIFT) is needed.
CWA 104(b)(3) Wetlands Pilot Demonstration grants (WPD)	Eliminate duplicative reporting and switch to one annual report.	States should only report on the schedule laid out in the signed pilot grant funding package. R1 only requires annual reporting.
Annual report on the status of sanitary sewer operations (SSO) strategy annually	Eliminate--can discuss same during program reviews.	R7 agrees to eliminate written report in the workplan and continue periodic SSO strategy discussions with KS.
Web-based Reach Indexing Tool for Watershed Assessment Tracking and Environmental Results (WebRIT)	Upgrade to a more common program (e.g., ARCview) for efficient and effective data transfers.	R3 uses PCRIT and will eliminate WebRIT. PCRIT allows the use of ARCview to spatially locate data.
Permitting for Environmental Results (PERs)	Eliminate PERS and associated reporting; duplicative of information in PPA.	EPA will not require updates of the data collected for PERs strategy but will continue to monitor implementation of state action items through a

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		GPRA measure.
Report on the percent of Publicly Owned Treatment Works (POTWs) that are beneficially reusing biosolids	Modify to require only the percent of beneficially reused biosolids.	EPA no longer requests this information.
Arsenic compliance reporting	Change to annual from quarterly.	Arsenic reporting frequency has been reduced to semi-annual (effective FY07).
Documentation of Total Maximum Daily Loads (TMDL) program activities funded by CWA sec. 106	Eliminate R6 requirement for state TMDL programs to copy and mail contract work orders semi-annually.	R6 resolved documentation issues with TX in July 2007.
Duplicative reporting of TMDL project funding sources.	R6 requires state to duplicate information in TMDL Quality Assurance Project Plans (QAPPs). Eliminate as R6 can review QAPPs to obtain funding source information.	Approval authority of TMDL QAPPs has been delegated to the state. EPA will receive a single copy of the QAPP as a grant deliverable and additional copies of the TMDL QAPPs are not required. Resolution was communicated to TX in July 2007 by R6.
NPDES 106 and 319 program report	Eliminate requirement of annual summary of quarterly reports – duplicative.	Annual summary of quarterly reports is no longer required by R3.
Biennial reporting on state water quality and provision of lists of impaired water pursuant to CWA sec. 305(b) and 303(d)	Allow states to keep 303d and 305b separate: integration of the two is burdensome.	The CWA does not require one integrated report but EPA encourages states to adopt an integrated report format to facilitate data compilation and comparisons.
Underground Injection Control (UIC) program reports	Eliminate information on specific well types (quarterly and annually); change quarterly reports to annual and incorporate report into PPA annual report; program activity measures (PAMs) are duplicative of requirements of form 7520.	UIC paper/web-based reporting will be replaced by a national database which will reduce overall burden (effective FY08).
SDWIS	Provide SNC determinations via SDWIS-state to perform data QC before R6 requests this report; EPA should develop electronic reporting mechanism for non-compliance in SDWIS-state and fed.	Currently developing a tool to allow states to make compliance determinations. A pilot of this tool will be available in 2007 for state use and to receive comment.
SDWIS	Drinking water enforcement NOVs, orders, penalties assessed/collected, warning letters:	States will not be required to manually report drinking water enforcement to R4 as long as the

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	eliminate as information is in SDWIS.	information is reported into SDWIS.
Sec. 319 grant reporting	Grant Reporting Tracking System (GRTS): modify to allow data to be uploaded from spreadsheets, databases, or text file in addition to manual entry.	Information contained in GRTS will not be requested by R3.
Watershed permit issuance	Eliminate—not compatible with other permit system.	Beginning in FY08, states will not be asked to report this measure.
Permits providing for trading	Eliminate.	EPA agrees to change but not eliminate the measure. New FY08 measure has replaced count on permits and focuses on number of facilities instead.
CWA sec. 106 and 604(b) workplans and status reports	Use spreadsheet format currently used by region for status report as base document for workplans.	PA is now using R3's spreadsheet format.
Non-point source report	Preparation is time-consuming and the glossy report that R6 requires is expensive to print.	A single report from R6 states on their 319 program activities is required and due at the end of January each year. Glossy report is not required and reports have been streamlined. R6 will work with OK to ensure all regulatory requirements are met without being overly burdensome.
Provide EPA with documents for review of all draft major/minor NPDES permits/applications	Modify to include review of 10 permits per year. EPA can review others during the program reviews. Periodic program oversight and in-depth analysis of a select group or subset of permits should provide enough insight into the KS' NPDES program.	R7 encourages electronic submission which should help reduce the reporting burden. R7 will discuss the minor permit issue with KS during workplan negotiations for the calendar year 2008 workplan. Language in the current workplan regarding review of minor non-stormwater/non-CAFO NPDES permits will be deleted at the first available opportunity. Also, as part of R7's overall process of evaluating state oversight, this issue will be included on a list of recurring program review issues which will be elevated for discussion.

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